

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

KEVIN REAGAN,

Plaintiff,

v.

Civil Action No. 4:23-cv-158

**WILLIAM J. BURNS, Director,
Central Intelligence Agency,**

Defendant.

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT'S MOTION TO DISMISS¹**

Plaintiff Kevin Reagan, by and through undersigned counsel, with no objection from Defendant, hereby moves for an extension of three weeks, up to and including July 17, 2025, to submit his response to Defendant's motion to dismiss (Dkt. 61) to the Agency's Prepublication Classification Review Board (PCRB), followed by filing the approved response in this Court after PCRB review, and Plaintiff states as follows:

1. On June 12, 2025, Defendant filed a motion to dismiss Plaintiff's Amended Complaint (Dkt. 61), triggering a 14-day response deadline, *i.e.*, until June 26, 2025, for Plaintiff to submit his opposition to the PCRB for review, followed by a filing in this Court. Plaintiff requests a three-week extension of this response deadline, *i.e.*, until July 17, 2025, to submit his opposition to Defendant's motion to dismiss to the PCRB.

¹ Plaintiff's counsel submitted this Motion and the proposed order to the PCRB on June 20, 2025, for review, and the PCRB approved the filing of this Motion, with the proposed order, on June 24, 2025.

2. Plaintiff's counsel has many pending matters and deadlines, in cases in the EEOC and federal court and in security clearance cases. For example, lead counsel for Plaintiff, Daniel Gebhardt, has an opposition to a motion for summary judgment due on July 15, 2025 in an EEOC case, and many cases in active discovery, with discovery responses to be drafted, depositions to be taken, discovery disputes to be litigated, etc. Further, Plaintiff's counsel has a multitude of other pending matters with pre-existing deadlines.

3. Plaintiff's counsel Daniel Gebhardt has conferred with Defendant's counsel concerning this Motion, and Defendant has no objection to this extension Motion.

4. This is Plaintiff's first extension request regarding the deadline for his response to Defendant's motion to dismiss (Dkt. 61). Good cause exists to grant this extension request, and it will not prejudice either party.

WHEREFORE, for the above reasons, Plaintiff respectfully requests that this Court grant this Motion and extend the deadline for Plaintiff's submission of his response to Defendant's motion to dismiss to the PCRB by three weeks, i.e., until July 17, 2025, followed by filing the approved response in this Court subsequent to PCRB review. A proposed order is attached.

Dated: June 24, 2025

Respectfully submitted,

/s/ LENORE C. GARON
LENORE C. GARON
VSB # 39934
Law Office of Lenore C. Garon, PLLC
2412 Falls Place Court
Falls Church, VA 22043
Phone: 703-534-6662
Fax: 703-534-4448
Lenore@lenorecgaron.com

Attorney for Plaintiff

/s/ DANIEL K. GEBHARDT
DANIEL K. GEBHARDT

Admitted Pro Hac Vice
(D.C. Bar No. 975703)
Solomon Law Firm, PLLC
1025 Connecticut Avenue, N.W.
Suite 1000
Washington, DC 20036
Phone: 866-833-3529
Fax: 202-688-1896
dgebhardt@fedemploylaw.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Plaintiff's Unopposed Motion for Extension of Time to Respond to Defendant's Motion to Dismiss, and a proposed order, were served on this 24th day of June 2025, via electronic filing using this Court's CM/ECF system, on Defendant:

Daniel P. Shean, Assistant U.S. Attorney
Virginia State Bar No. 84432
Counsel for Defendant
Office of the United States Attorney
101 West Main Street, Suite 8000
Norfolk, Virginia 23510-1671

Email: daniel.shean@usdoj.gov

/s/ Lenore C. Garon
Lenore C. Garon